



May 31, 2024

**VIA ECF**

Honorable Brian R. Martinotti, U.S.D.J.  
United States District Court  
District of New Jersey  
U.S. Post Office & Courthouse  
2 Federal Square  
Newark, NJ 07102

**Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS,  
MDL No. 3080**

Dear Judge Martinotti:

Pursuant to CMO #5, the parties provide the following status update for the weeks of May 20 and May 27:

1. The parties provided an update to Judge Singh as to their discussions regarding a proposed Plaintiff Fact Sheet for use in the Self-Funded Payer and State Attorney General Tracks [ECF 188]. The parties are continuing to confer and will provide a further status update to Judge Singh on June 7, 2024.
2. The parties are working to revise the ESI Order to conform with Judge Singh's May 28, 2024 Order Regarding Disputes Over ESI Protocol [ECF 186].
3. Defendants are working to reproduce all documents that have been produced to plaintiffs in cases now centralized in/coordinated with this MDL.

We thank the Court for its continuing attention to this matter.

Respectfully submitted,

*/s/ James E. Cecchi*  
James E. Cecchi  
*Liaison Counsel for*  
*Third-Party Payer Class Track*

*/s/ David R. Buchanan*  
David R. Buchanan  
*Liaison Counsel for*  
*Self-Funded Payer Track*

*/s/ Joanne Cicala*  
Joanne Cicala  
*Liaison Counsel for*  
*State Attorney General Track*

*/s/ John D. Tortorella*  
John D. Tortorella

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cc: Honorable Rukhsanah L. Singh, U.S.M.J. (*via* ECF)  
Counsel of Record (*via* ECF)